

BEFORE THE
Federal Communications Commission

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**FEDERAL COMMUNICATIONS COMMISSION
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In re Comments of)

Southeastern Ohio Television System)
Station WHIZ (TV), Ch. 18)
Zanesville, Ohio)

MM Docket 87-268

To: The Commission

**COMMENTS OF SOUTHEASTERN OHIO TELEVISION SYSTEM
ON DIGITAL TV ALLOTMENT PLAN**

Southeastern Ohio Television System, licensee of UHF Television Station WHIZ-TV, Zanesville, Ohio, by its attorney, hereby submits its comments on the allotment plan proposed for digital TV. In support of these comments, it is shown as follows:

Preliminary Statement

1. WHIZ-TV operates in Zanesville, Ohio on UHF Channel 18 and is an affiliate of the NBC Television Network. Zanesville is located approximately 52 miles east of Columbus, Ohio. WHIZ-TV is the only television station located in the Zanesville, Ohio market which is one of the smallest TV markets in the country which has been traditionally ranked as the 202nd ADI market. The Zanesville ADI consists of a single Ohio county - Muskingum County. In May 1996, WHIZ-TV celebrated its 43rd anniversary.

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The Owners of WHIZ-TV Were Early Entrants
Into UHF Television Broadcasting.

2. Entry of the owners of WHIZ-TV into UHF broadcasting was encouraged by public notices from the Commission and from transmitter manufacturers, tower companies, antenna companies, and producers of studio equipment, which asserted that UHF TV would be competitive with established VHF stations. The owners of WHIZ-TV made the substantial investment into construction of a UHF TV station in Zanesville. Unfortunately, despite the assurances of technical comparability, many UHF stations simply did not work as had been anticipated and did not provide quality signals to viewers. As a result, UHF TV stations went off the air by the dozens, and then by the hundreds.

3. The history of WHIZ-TV provides a good example of the technical comparability problem. At the outset, the station was assigned Channel 50 by the Commission. After the station went on the air, experience in the field proved that in the hills of Southeastern Ohio, Channel 50 worked fine only in some locations. If a viewer lived on the other side of a hill, the effect of the terrain was either no signal or a signal loaded with ghosts from the surrounding hills. In addition, there were other problems faced by UHF stations in attempting to compete with VHF stations for audience. In the absence of all-channel receivers, the UHF stations had to use set top converters or expensive outdoor antennas which resulted in terribly unstable signals. For WHIZ-TV, the result of these technical problems was that the investors lost over \$200,000.

4. Finally, WHIZ-TV's own engineers in Zanesville, after much study, decided that based on the local terrain, the only answer for the station would be to switch channels

from Channel 50 to Channel 18 at an additional cost of over \$250,000. The result of the channel change was that there was a signal improvement that was equivalent to increasing power by five times. The signal on the lower channel actually bent behind more hills, and, there was an immediate increase in the ability of the station to reach its audience. The signal improvement is the reason WHIZ-TV has been able to remain on the air and to continue serving a wide swath of Appalachian country not served by any other commercial stations.

The Digital TV Allotment Plan

5. The purpose of the foregoing historical recitation is that WHIZ-TV, having survived the difficult early days of UHF television now faces the anxiety of a proposed change in its operation which will determine its future viability. The advent of Advanced Television Service has raised concerns as to how stations like WHIZ-TV will be treated in the allocation of the new digital channels, and whether the new channels will operate as claimed and provide the same degree of coverage.

6. Under the current plan, WHIZ-TV will probably have to operate on two channels over a ten year period - one ATV, the other NTSC. In the case of WHIZ-TV, it will need to construct a new tower because the present tower is not capable of supporting another antenna. In addition, a new transmitter, new antenna, and associated equipment will be needed. Based on the size of the market, WHIZ-TV faces the possibility that if the digital receiver set population did not grow according to plan, it could be confronted at the end of the "trial" period broadcasting to a vastly smaller audience, and, at the same time, a huge amount of expense for additional digital

equipment to convert entirely to the new mode.

7. If ATV does not develop as projected (just as early UHF channels did not work as projected) stations like WHIZ-TV may face not only service interruptions and coverage shortfalls, but, may find themselves unable to compete. Loss of these stations may result. The Commission must make sure that the adopted standards are going to work for small stations like WHIZ-TV.

8. WHIZ-TV supports the decision by the Commission to allot digital channels to all eligible existing broadcasters and the decision to maintain existing service areas. The emphasis on good management of the spectrum is also supported. Finally, WHIZ-TV strongly supports inclusion of procedures, as discussed in the NPRM, that would enable broadcasters to request alternative allotments for their market in the event there are problems with the initial allotment.

Eleventh Hour Challenges From the
Computer, Cable and Film Industries are Spurious


9. The WHIZ-TV station owners have followed the eight year effort to reach agreement on digital TV standards. After seeing a recommendation that the Grand Alliance digital standard be adopted as the standard for the United States, representatives of the computer industry and filmmakers, have suddenly made an eleventh hour appearance and have challenged the Grand Alliance standard. They ignore the fact that the digital TV standards proposed apply only to broadcasters. It is clear that these companies approach the standard with their own business interests in mind; the problems of small UHF stations operating on the current NTSC standard are not the focus of their interest. Computer software giant, Microsoft, is on record as being opposed to the

adoption of any digital standard.

Conclusion

10. In the consideration of the welter of technical studies and conflicting positions, it is hoped that the foregoing comments will highlight the fact that there are UHF pioneers which feel like pawns in the process whose genuine concerns are not always expressed and whose future may be in jeopardy.

Respectfully submitted,

By: 
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